

Sonja Farak (Drug Chemist)

Name

Who are you employed with?

State of Mass.

What do you do for State of Mass.?

Chemist.

Do you work out of a laboratory?

Which lab?

In Amherst.

How long have you been a chemist with the State of Mass?

Describe your duties and responsibilities as a chemist? To general? Maybe something like “..to become a chemist to analyze suspected drugs” or “...to become a drug analysis chemist” or “to become a chemist in the Drug Analysis Laboratory”

Prior to becoming a chemist with the State did you attend college?

Which college?

What did you receive a degree in?

Did you receive any training to become a chemist? too general? Maybe something like “...to become a drug analysis chemist” or “to become a chemist in the Drug Analysis Laboratory”

When?

Describe the training you received?

Have you had the occasion to chemically analyze substances to determine whether the substance is or contains a controlled substance?

How many times?

One by one show Ms. Farak the packages of pills

#1 92 Yellow Alprazolam Pills (████████) This was submitted as 92 pills, but when I opened the bag and counted them, there were 113 pills (this should be reflected on the certificate)

Do you recognize this?

How do you recognize this package?

Is this in substantially the same condition as when you received it?

What changes are there?

Other than that does the government's exhibit appear to be in the same condition?

When did you receive this package?

May 7, 2010

Did you perform a test?

What test did you perform?

For the Alprazolam pills (Class E) we only use appearance and labeling to identify them, so you may not want to actually ask about what tests were used. Something like "Did you have the opportunity to examine the contents of this package" may sound better and bring up fewer questions regarding this matter.

Based on your training and experience and the analysis that you performed do you have an opinion as to what the substance is?

Alprazolam.

What is Alprazolam?

A controlled substance – prescription drug.

What class does it fall under?

Class E.

What is the basis for the opinion? Seems a little redundant as you previously stated "Based on your training and experience and the analysis..."

Did you memorialize your finding?

Do you recognize this?

What is it?

Drug certificate (that corresponds to this piece of evidence – same drug lab number on the submission as well as the certificate)

Is this your signature at the bottom of it?

Introduce as an exhibit.....

#2 74 Alprazolam Pills (████████)

Do you recognize this?

How do you recognize this package?

Is this in substantially the same condition as when you received it?

What changes are there?

Other than that does the government's exhibit appear to be in the same condition?

When did you receive this package?

May 7, 2010

Did you perform a test?

What test did you perform?

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What is Alprazolam?

A controlled substance – prescription drug.

What class does it fall under?

Class E

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Do you recognize this?

What is it?

Drug certificate (that corresponds to this piece of evidence – same drug lab number on the submission as well as the certificate)

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Introduce as an exhibit.....

#3 43 Alprazolam (██████████)

Do you recognize this?

How do you recognize this package?

Is this in substantially the same condition as when you received it?

What changes are there?

Other than that does the government's exhibit appear to be in the same condition?

When did you receive this package?

May 7, 2010

Did you perform a test?

What test did you perform?

For the Alprazolam pills (Class E) we only use appearance and labeling to identify them, so you may not want to actually ask about what tests were used. Something like "Did you have the opportunity to examine the contents of this package" may sound better and bring up fewer questions regarding this matter.

Based on your training and experience and the analysis that you performed do you have an opinion as to what the substance is?

Alprazolam

What is Alprazolam?

A controlled substance.

What class does it fall under?

Class E.

What is the basis for the opinion? Seems a little redundant as you previously stated
"Based on your training and experience and the analysis..."

Did you memorialize your finding?

Do you recognize this?

What is it?

Drug certificate (that corresponds to this piece of evidence – same drug lab number on the submission as well as the certificate)

Is this your signature at the bottom of it?

Introduce as an exhibit.....

#4 65 Morphine Pills ([REDACTED])

Do you recognize this?

How do you recognize this package?

Is this in substantially the same condition as when you received it?

What changes are there?

Other than that does the government's exhibit appear to be in the same condition?

When did you receive this package?

May 7, 2010

Did you perform a test?

What test did you perform?

If not asking for the details for the Alprazolam pills, you may not want to ask about the test for the other pills as well. The same thing I suggested to ask for the Alprazolam pills works well here too, "Did you have the opportunity to examine the contents of this package?" If the defense attorney wants to know what tests, he/she can always ask me on cross.

Based on your training and experience and the analysis that you performed do you have an opinion as to what the substance is?

Morphine

What is Morphine?

A controlled substance – prescription drug.

What is the basis for the opinion? Seems a little redundant as you previously stated “Based on your training and experience and the analysis...”

Did you memorialize your finding?

Do you recognize this?

What is it?

Drug certificate (that corresponds to this piece of evidence – same drug lab number on the submission as well as the certificate)

Is this your signature at the bottom of it?

Introduce as an exhibit.....

#5 Hydrocodone Pills (████████)

Do you recognize this?

How do you recognize this package?

Is this in substantially the same condition as when you received it?

What changes are there?

Other than that does the government's exhibit appear to be in the same condition?

When did you receive this package?

May 7, 2010

Did you perform a test?

What test did you perform?

If not asking for the details for the Alprazolam pills, you may not want to ask about the test for the other pills as well. The same thing I suggested to ask for the Alprazolam pills works well here too, “Did you have the opportunity to examine the contents of this package?” If the defense attorney wants to know what tests, he/she can always ask me on cross.

Based on your training and experience and the analysis that you performed do you have an opinion as to what the substance is?

Hydrocodone

What is Hydrocodone?

A controlled substance – prescription drug.

What is the basis for the opinion? Seems a little redundant as you previously stated “Based on your training and experience and the analysis...”

Did you memorialize your finding?

Do you recognize this?

What is it?

Drug certificate (that corresponds to this piece of evidence – same drug lab number on the submission as well as the certificate)

Is this your signature at the bottom of it?

Introduce as an exhibit.....